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As Plan Administrator*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

Chapter 11 Case No.

08-13555 (SCC)

(Jointly Administered)

**TWENTY-FIRST NOTICE OF WITHDRAWAL OF DEBTORS'
APPLICATION TO ASSUME CERTAIN EXECUTORY CONTRACTS**

PLEASE TAKE NOTICE of the following:

1. On October 25, 2011, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed a Plan Supplement (as amended from time to time the “Plan Supplement”) [ECF No. 21254], containing documents and schedules in connection with the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors (the “Plan”), dated December 5, 2011 [ECF No. 22973]. The Plan was confirmed by order of the Court on December 6, 2011 (the “Confirmation Order”) [ECF No. 23023] and became effective on March 6, 2012.

2. The hearing on the Debtors’ proposed assumption of certain executory contracts and unexpired leases set forth on Exhibit 2 to the Plan Supplement has been adjourned until (i) June 17, 2015, or (ii) such other date as may be scheduled by the Debtors, with leave

from the Court, with at least thirty days' notice to the relevant counterparty, or as otherwise agreed.

3. On January 31, 2012, February 9 and 13, 2012, April 3, 2012, May 31, 2012, June 25, 2012, August 14, 2012, October 19, 2012, November 16, 2012, December 4, 2012, February 8, 2013, March 8, 2013, June 27, 2013, October 28, 2013, February 24, 2014, June 17, 2014, July 17, 2014, October 13, 2014, January 29, 2015, and March 2, 2015, the Debtors filed notices of withdrawal of their application to assume certain executory contracts or to defer indefinitely the hearing on their application to assume certain executory contracts.

4. The Debtors hereby withdraw their application to assume any and all executory contracts with Wellmont Health System, as referenced on Exhibit 2 to the Plan Supplement.

5. The Debtors reserve their rights to withdraw in the future their application to assume additional executory contracts and unexpired leases.

Dated: June 3, 2015
New York, New York

/s/ David S. Cohen
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